ORIGINAL

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December 2, 2009

VIA HAND DELIVERY

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
Attn: Video Division, Media Bureau

Re: MB Docket No. 09-_____
RM-_____
KWTV-DT, Oklahoma City, OK, Facility ID No. 25382
Petition for Rulemaking

Dear Ms. Dortch:

Transmitted herewith, on behalf of Griffin Licensing, L.L.C. ("Griffin"), the licensee of KWTV-DT, Oklahoma City, Oklahoma, Facility ID No. 25382 ("KWTV"), are an original and four (4) copies of a Petition for Rulemaking to amend the Post-Transition DTV Table of Allotments set forth in Section 73.622(i) of the Commission's Rules. Specifically, Griffin seeks to substitute Channel 39 as KWTV's channel allotment in lieu of Channel 9.

Should you have any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

David A. O'Connor
Counsel for Griffin Licensing, L.L.C.

Enclosure

cc: Barbara Kreisman

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 73.622(i)	)	MB Docket No. 09-____
Post-Transition Table of Allotments,	)	RM-_____
Digital Television Broadcast Stations	)	
(Oklahoma City, Oklahoma)	)	

To: Office of the Secretary
For: Chief, Video Division
Media Bureau

PETITION FOR RULEMAKING

Griffin Licensing, L.L.C. ("Griffin"), the licensee of KWTV-DT, Oklahoma City, Oklahoma, Facility ID No. 25382 ("KWTV-DT"), by its counsel and pursuant to Sections 1.401, 73.616 and 73.622(a) of the Commission's Rules,[1] hereby respectfully petitions the Commission to institute a rulemaking proceeding to amend the Post-Transition DTV Table of Allotments set forth in Section 73.622(i) by substituting Channel 39 as KWTV-DT's channel allotment in lieu of Channel 9.

Specifically, the Post-Transition DTV Table of Allotments would be amended as follows:

City and State	Present	Proposed
Oklahoma City, OK	7, **9**, *13, 15, 24, 27, 33, 40, 50, 51	7, *13, 15, 24, 27, 33, **39**, 40, 50, 51

Griffin is proposing this channel substitution because KWTV-DT, like many television stations that returned to their former VHF analog channels for post-transition DTV operations, has experienced significant technical difficulties on Channel 9. Griffin has received viewer complaints from throughout the KWTV-DT service area, and has determined that the majority of viewer complaints -- some 70% -- are from viewers in core areas, while only 30% are from

[1] 47 C.F.R. §§ 1.401, 73.616, 73.622(a).

fringe areas where poor reception might normally be expected. Griffin has been working with these viewers in an effort to resolve reception issues, but believes that the problems associated with digital operations on Channel 9 may be insurmountable.

As a result, Griffin sought and obtained authority to operate on its pre-transition DTV channel, Channel 39, on an experimental basis.[2] Since obtaining such experimental authority, KWTV-DT has experienced a noticeable increase in the number of viewers able to receive the KWTV-DT signal. After a thorough analysis of this situation, Griffin has concluded that substituting Channel 39 for Channel 9 at Oklahoma City will substantially resolve the reception issues that KWTV viewers have been experiencing. Griffin is filing this petition for rulemaking proposing to amend the DTV Table of Allotments accordingly.

In furtherance of this petition, Griffin is including the attached Engineering Statement which demonstrates that KWTV-DT's proposed operations on Channel 39 on a permanent basis are not predicted to cause impermissible interference to any other broadcast station. The Engineering Statement also shows that Channel 39 can be substituted for Channel 9 at Oklahoma City, as proposed, in compliance with the principal community contour coverage requirements of Section 73.625(a) of the Commission's Rules.[3] KWTV-DT's proposed permanent operations on Channel 39 would encompass Oklahoma City and is predicted to serve 103.4% of the population served by the former KWTV analog Channel 9 facility.

For the Commission's convenience, the present and proposed Appendix B parameters are as follows:[4]

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[2] *See* FCC File Nos. BDSTA-20090731AFN (granted Aug. 31, 2009); BDSTA-20091008ADE (granted Oct. 19, 2009) (authorizing an increase in power on Channel 39 up to 1000 kW ERP).

[3] 47 C.F.R. § 73.625(a).

[4] *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Memorandum Opinion and Order on Reconsideration of the Seventh Report and Order

Present Appendix B:

Facility ID	State and City		NTSC	DTV					
			Ch	Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDDMMSS)
25382	OK	Oklahoma City	9	9	19.4	465	74545	353258	972949

And as proposed:

Facility ID	State and City		NTSC	DTV					
			Ch	Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDDMMSS)
25382	OK	Oklahoma City	9	39	1000	465	68886	353258	972949

If the proposal set forth herein is adopted, Griffin will promptly file the appropriate application for modification of KWTV-DT's licensed facilities to specify operation on DTV Channel 39 at Oklahoma City, Oklahoma with facilities consistent with those specified in the attached Engineering Statement.

For the foregoing reasons, Griffin respectfully requests that the Commission amend Section 73.622(i) by substituting Channel 39 as KWTV-DT's channel allotment in lieu of Channel 9. A grant of this petition would further the public interest by resolving viewability issues for numerous KWTV viewers so that they may continue to receive the valuable broadcast

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and Eighth Report and Order, MB Docket No. 87-268, 23 FCC Rcd 4220, FCC 08-72, App. B at 37 (rel. Mar. 6, 2008).

services offered by KWTV-DT, including life-saving weather information.

Respectfully submitted,

GRIFFIN LICENSING, L.L.C.

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Wilkinson Barker Knauer, LLP
2300 N Street, NW
Suite 700
Washington, D.C. 20037
Tel: 202-783-4141
Fax: 202-783-5851
E-mail: doconnor@wbklaw.com
Its Counsel

Dated: December 2, 2009

EXHIBIT E

ENGINEERING REPORT RE
PETITION FOR RULEMAKING
TO AMEND DTV TABLE OF ALLOTMENTS
KWTV-DT, OKLAHOMA CITY, OKLAHOMA
CHANNEL 39 1000 KW (MAX DA) 478 METERS

DECEMBER 2009

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

Ross J. Heide, being duly sworn upon his oath, deposes and states that:

He is a graduate of the Massachusetts Institute of Technology in Operations Research and Management Science, a Registered Professional Engineer in the District of Columbia, and employed by Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.

Ross J. Heide
District of Columbia
Professional Engineer
Registration No. PE900748

Subscribed and sworn to before me this 2nd day of December 2009.

Notary Public

My Commission Expires: 2/28/2013

Introduction

This engineering report is prepared on behalf of Griffin OKC Licensing, L.L.C. for its station KWTV-DT, Oklahoma City, OK ("KWTV"). KWTV timely transitioned from its pre-transition DTV operations on Channel 39 to post-transition DTV operations on Channel 9. However, like many other stations with high VHF facilities, KWTV has experienced severe technical difficulties since making the transition to digital operations on Channel 9. KWTV has been granted Temporary Experimental Authority to operate Channel 39 with an ERP up to 1000 kW (Max DA) by simulcasting the programming of KWTV's Channel 9 (FCC File No. BDSTA-20091008ADE). KWTV has determined that DTV Channel 39 will better serve its viewers. The proposed facility is predicted to serve 103.4% of the population served by the former KWTV analog Channel 9.

Therefore, KWTV is petitioning to amend the DTV Table of Allotments to substitute DTV Channel 39 for DTV Channel 9 in Tulsa, Oklahoma. The engineering data provides herein describes the facility for which KWTV will apply in subsequent CP and license applications. This facility is identical to the current STA with maximum ERP of 1000 kW.

Antenna Site

The operating Channel 39 DTV antenna is installed on a guyed tower, located at corner of North Kelley Avenue and 122nd Street, Oklahoma City, Oklahoma County, Oklahoma. The geographic coordinates (NAD-27) of the tower are as follows.

North Latitude: 35° 35' 52"

West Longitude: 97° 29' 22"

The tower structure registration number ("ASRN") is 1045226.

The following data shows the pertinent information concerning the proposed DTV operation.

Antenna and Power Data

Antenna:	Andrew	Model ATW25H3H	
	Beam Tilt	0.75 degrees electrical	
Transmitter Power Output		47.91 kW	16.80 dBk
Transmission Line Efficiency/Loss		69.0%	-1.61 dB
Input to Ch. 39 Antenna		33.06 kW	15.19 dBk
Antenna Gain, Main Lobe		30.25	14.81 dB
Effective Radiated Power		1000 kW	30.00 dBk

Elevation Data

Elevation of the site above mean sea level:	335.9 meters
Elevation of the top of supporting structure: above ground	502.0 meters
Elevation of the top of supporting structure: above mean sea level	837.9 meters
Height of DTV antenna radiation center: meters above ground	491.1 meters
Height of DTV antenna radiation center: above mean sea level	827.0 meters
Height of DTV antenna radiation center: above average terrain	478 meters

The attached Exhibit E-1 shows a vertical sketch of the existing KWTV-DT antenna supporting structure. The FCC tower registration number is 1045226. Exhibit E-3 shows the manufacturer's antenna data as specified in §73.625(c)(3).

Topographic Data

The average elevation data of the eight cardinal and other radials, from 3.2 to 16.1 kilometers, is based on the NGDC 3-second terrain database.

Contour Data

Utilizing the formula in Section 73.625(b)(2) for the effective heights shown on the attached tabulation, the depression angle A_h, for each azimuth has been calculated. The maximum radiation values has been used to calculate ERP where the vertical radiation pattern at these angles is greater than 90% of the maximum.

The distances along each radial to the limits of F(50,90) 41 dBu and 48 dBu contours were determined as specified in Section 73.625(b) by reference to the propagation data for Channels 14-69, as published by the Commission in Figures 10b and 10c, Section 73.699 of its rules.

The distances along 36 radials (every 10 degrees) to the 41 dBu and 48 dBu contours, the average elevations, and the effective antenna heights are included on the attached tabulation (Table I). The 41 dBu and 48 dBu contours determined from these distances are shown on the attached map (Exhibit E-2). The 48 dBu contour encompasses the principal community.

Interference Situation

The attached Table II shows the pertinent authorized stations potentially affected by the 1000 kW operation. The interference analysis was performed using the higher-resolution 1 km

cell size, and KWTV hereby requests that the FCC use the 1 km cell size when evaluating this proposal. Only a non-operating authorized facility, the allotment of KWOG-DT, Ch. 39, Springdale, Arkansas, is predicted to receive greater than 0.5% interference.

Largest in DMA Comparison

The following table compares the area within the noise-limited contour for the proposed 1000 kW ERP to the larger areas of several authorized stations in the Oklahoma City DMA. Therefore, KWTV will not exceed the service area of the largest authorized station in the market.

Call	Ch.	Status	ERP kW	HAAT (m)	FCC File No.	Area sq.km
KTUZ	29	CP Mod	1000	474	BMPCDT-20080619AKA	39,816
KAUT	40	Lic	1000	475	BLCDT-20060504ACH	39,347
KSBI	51	CP	1000	458	BPCDT-19991028AFH	38,965
KWTV	39	Exp	1000	478	proposed	38,720

Environmental Statement

Since the proposal will utilize the presently installed and operating antenna, it is believed the environmental concerns listed in Section 1.1307(a) the Commission's rules are not pertinent; therefore, those issues have not been addressed.

An evaluation has been made to determine compliance with the Commission's specified standards for human exposure to RF fields as set forth in the OET Bulletin No. 65 dated August 1997. KWTV-DT will be operating with an effective radiated power of 1000 kW and a radiation center of 491.1 meters above ground level. The maximum antenna relative field factor

is 0.05 towards the ground at the base of the tower. It is calculated that proposed operation would have less than 0.6 microwatts per square centimeter ($\mu W/cm^2$) RF field at 2 meters above the base of tower. The Commission's MPE guidelines for Channel 39 (620-626 MHz) TV operation are 2,067 $\mu W/cm^2$ for the occupational/controlled and 413 $\mu W/cm^2$ for the general population/uncontrolled environment. The computed RF field due to the proposed operation would be less than 0.2% of the MPE for the general population/uncontrolled environment.

Therefore, members of the public and personnel working around the proposed TV facility would not be exposed to RF fields exceeding the Commission's guidelines. With respect to work performed on the tower, station KWTV-DT in coordination with other TV stations will establish procedures to ensure that workers are not exposed to RF fields above the Commission's guidelines, by reducing or turning off the power, as appropriate.

For the reasons stated above, it is believed this proposal complies with Section 1.1307(a) and (b) of the Commission's Rules; therefore, under Section 1.1306, it is categorically excluded from the environmental processing.

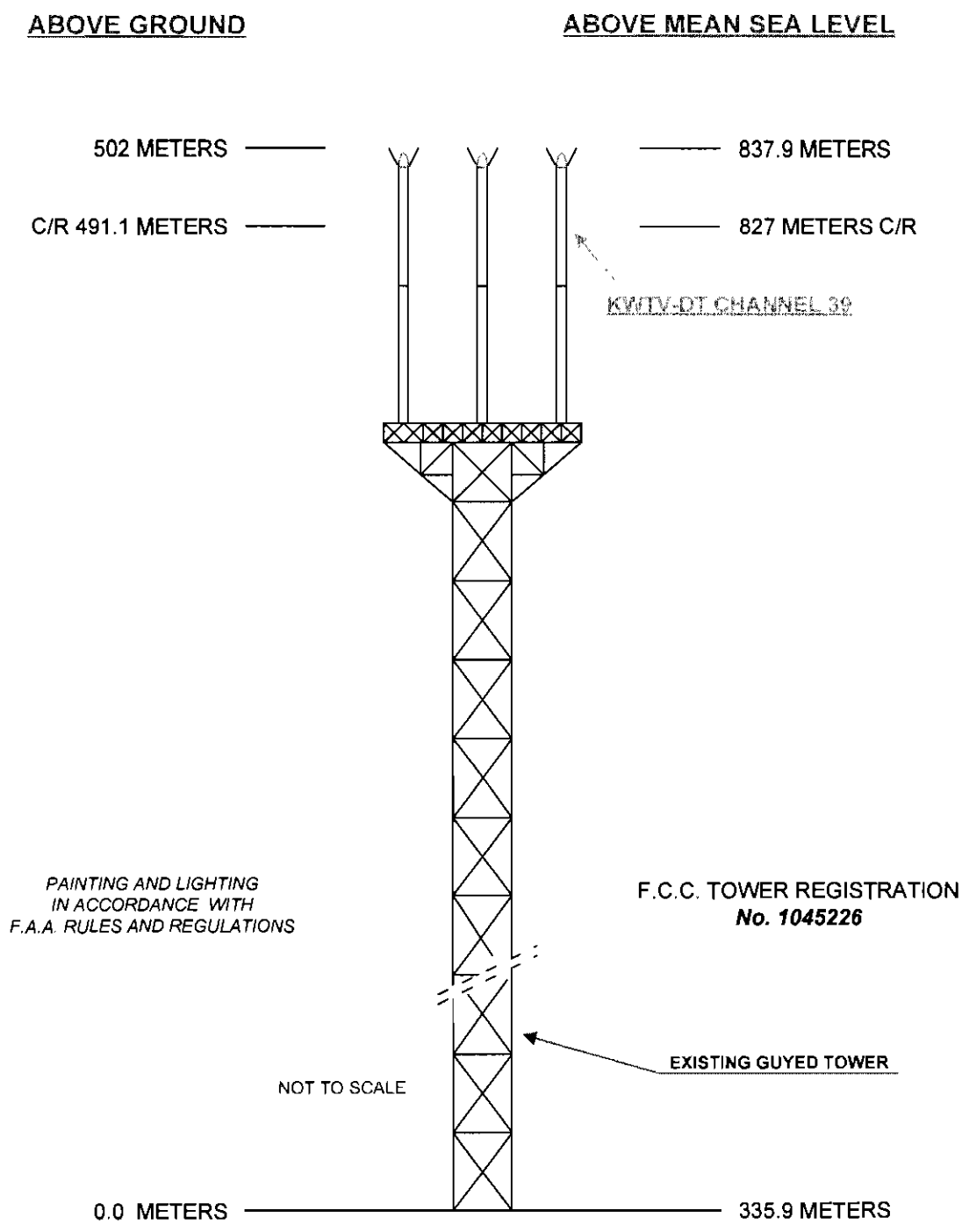


EXHIBIT E-1

VERTICAL SKETCH

FOR THE PROPOSED EXPERIMENTAL OPERATION OF

KWTV-DT, OKLAHOMA CITY, OKLAHOMA

DECEMBER 2009

COHEN, DIPPELL AND EVERIST, P.C. Consulting Engineers Washington, D.C.

TABLE I
COMPUTED COVERAGE DATA
FOR THE PROPOSED DTV OPERATION OF
KWTV-DT, OKLAHOMA CITY, OKLAHOMA
CHANNEL 39 1000 KW ERP 478 METERS HAAT
DECEMBER 2009

Radial	Average* Elevation	Effective Height	Depression Angle	ERP	Distance to Contour 48 dBu	41 dBu
N ° E, T	meters	meters	degrees	kW	km	km
0	351.7	475.2	0.604	776.2	95.0	110.1
10	352.6	474.3	0.603	748.2	94.6	109.7
20	349.0	477.9	0.606	687.2	94.2	109.1
30	341.5	485.4	0.610	649.6	94.2	109.2
40	341.1	485.8	0.611	679.0	94.6	109.6
50	333.4	493.5	0.615	788.5	96.5	111.7
60	325.4	501.5	0.620	919.7	98.5	113.8
70	319.0	507.9	0.624	974.2	99.6	114.8
80	331.7	495.2	0.616	935.1	98.1	113.5
90	336.6	490.3	0.613	902.5	97.4	112.8
100	342.4	484.5	0.610	904.4	97.0	112.4
110	345.9	481.0	0.607	883.6	96.5	111.9
120	346.9	480.0	0.607	819.0	95.8	111.0
130	351.0	475.9	0.604	753.4	94.8	109.9
140	351.5	475.4	0.604	729.3	94.5	109.5
150	350.2	476.7	0.605	769.1	95.0	110.1
160	350.8	476.1	0.604	863.0	95.9	111.3
170	350.7	476.2	0.604	958.4	96.8	112.3
180	353.8	473.1	0.602	1000.0	97.0	112.5
190	355.1	471.8	0.602	958.4	96.5	112.0
200	355.8	471.1	0.601	863.0	95.5	110.8
210	356.6	470.3	0.601	769.1	94.5	109.6
220	368.3	458.6	0.593	729.3	93.3	108.1
230	379.0	447.9	0.586	753.4	92.8	107.5
240	374.0	452.9	0.589	819.0	93.8	108.8
250	366.2	460.7	0.595	883.6	95.0	110.2
260	361.2	465.7	0.598	904.4	95.5	110.9
270	350.0	476.9	0.605	902.5	96.4	111.8
280	343.8	483.1	0.609	935.1	97.2	112.6

TABLE I
COMPUTED COVERAGE DATA
FOR THE PROPOSED DTV OPERATION OF
KWTV-DT, OKLAHOMA CITY, OKLAHOMA
CHANNEL 39 1000 KW ERP 478 METERS HAAT
DECEMBER 2009
(continued)

Radial	Average* Elevation	Effective Height	Depression Angle	ERP	Distance to Contour 48 dBu	41 dBu
N ° E, T	meters	meters	degrees	kW	km	km
290	338.7	488.2	0.612	974.2	97.9	113.4
300	334.6	492.3	0.615	919.7	97.8	113.1
310	334.1	492.8	0.615	788.5	96.5	111.7
320	330.5	496.4	0.617	679.0	95.5	110.5
330	331.3	495.6	0.617	649.6	95.0	110.0
340	337.7	489.2	0.613	687.2	95.0	110.0
350	339.4	487.5	0.612	748.2	95.6	110.7

*Based on data from FCC 3-second data base.

DTV Channel 39 (620-626 MHz)
Average Elevation 3.2 to 16.1 km 346.7 meters AMSL
Center of Radiation 827.0 meters AMSL
Antenna Height Above Average Terrain 478 meters
Effective Radiated Power 1000 kW (30 dBk) Max

North Latitude: 35° 35' 52"
West Longitude: 97° 29' 22"

(NAD-27)

COHEN, DIPPELL AND EVERIST, P.C.

TABLE II
PREDICTED INTERFERENCE
FOR THE PROPOSED DTV OPERATION OF
KWTV, OKLAHOMA CITY, OKLAHOMA
CHANNEL 39 1000 KW ERP 478 METERS HAAT
DECEMBER 2009

Channel	Call	City/State	Dist(km)	Status	FCC File No.	Result
24	KOMI-CD	WOODWARD OK	191.4	LIC	BLTTL-19950922IB	0.00%
25	KGCT-LP	NOWATA OK	206.5	LIC	BLTTA-20020805AAQ	0.00%
25	KUTU-CA	TULSA OK	148.3	LIC	BLTTL-20001120AAE	0.00%
36	KCHM-LP	OKLAHOMA CITY OK	25.5	APP	BMPTTA-20050707AAW	No interference
36	KCHM-LP	OKLAHOMA CITY OK	3.2	CP	BMJPTTA-20040504ABL	0.00%
38	K38GL	LAWTON OK	150.6	LIC	BLTTA-20031008AAD	No interference
38	KOHC-CA	OKLAHOMA CITY OK	26.4	LIC	BLTTA-20050808ACU	0.49%
39	KWOG	SPRINGDALE AR	294.8	PLN	DTVPLN-DTVPLN67347	1.50%
39	KWOG	SPRINGDALE AR	294.8	LIC	BLCDT-20070820ABS	0.44%
39	KLDT	LAKE DALLAS TX	338.3	CP	BPCDT-20080619AEY	0.01%
39	KLDT	LAKE DALLAS TX	343	PLN	DTVPLN-DTVPLN17433	0.00%
40	KAUT-TV	OKLAHOMA CITY OK	1.1	CP	BPCDT-20080620AFC	0.01%
40	KAUT-TV	OKLAHOMA CITY OK	1	PLN	DTVPLN-DTVPLN50182	0.45%
40	KAUT-TV	OKLAHOMA CITY OK	0	LIC	BLCDT-20060504ACH	0.00%

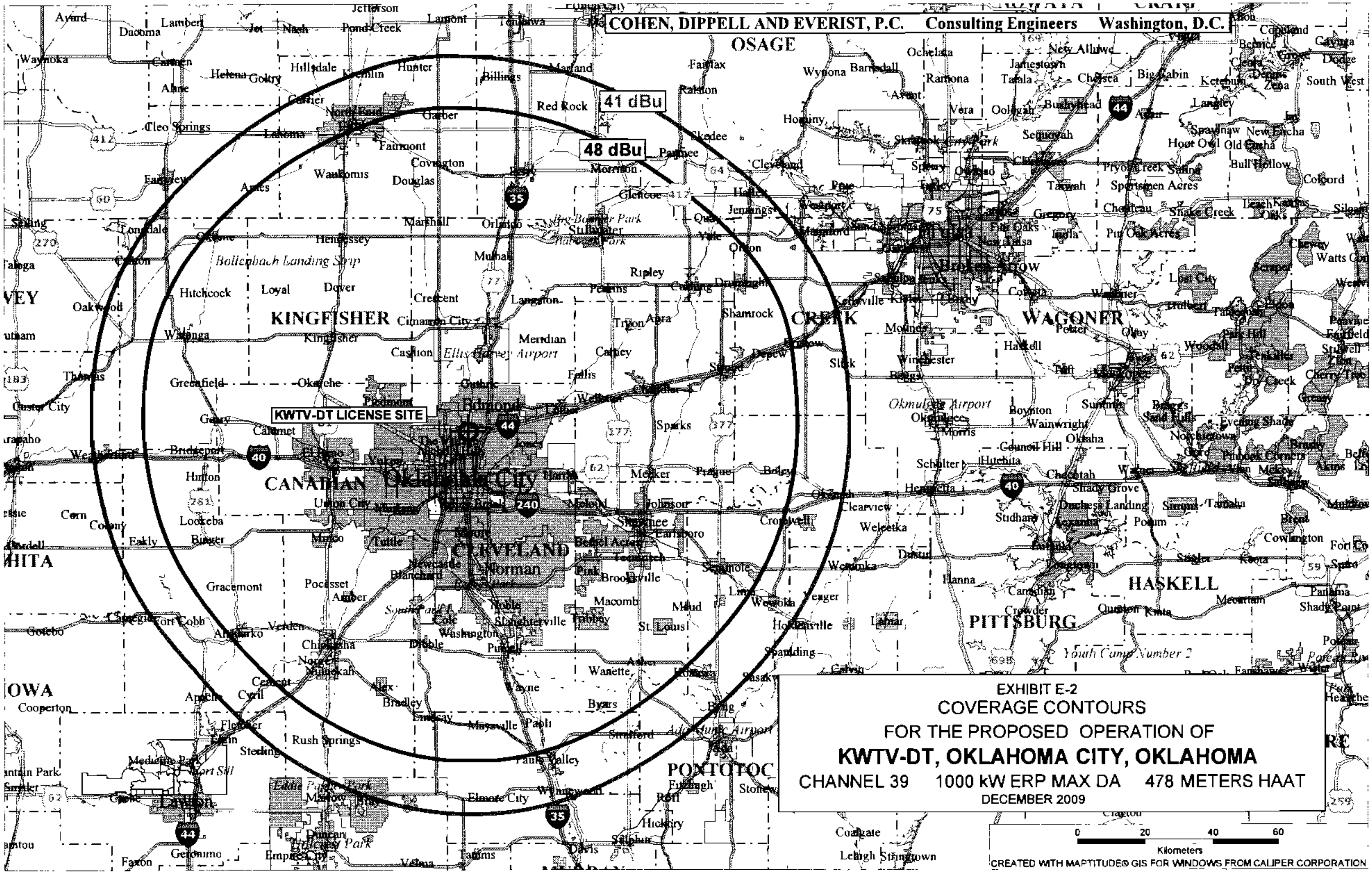

COHEN, DIPPELL AND EVERIST, P.C. Consulting Engineers Washington, D.C.
41 dBu
48 dBu
KWTV-DT LICENSE SITE
OSAGE
KINGFISHER
CREEK
WAGONER
CANADIAN
CLEVELAND
HASKELL
PITTSBURG
PONTOTOC
Oklahoma City
Edmond
Norman
EXHIBIT E-2
COVERAGE CONTOURS
FOR THE PROPOSED OPERATION OF
KWTV-DT, OKLAHOMA CITY, OKLAHOMA
CHANNEL 39 1000 kW ERP MAX DA 478 METERS HAAT
DECEMBER 2009
0 20 40 60
Kilometers
CREATED WITH MAPTITUDE® GIS FOR WINDOWS FROM CALIPER CORPORATION

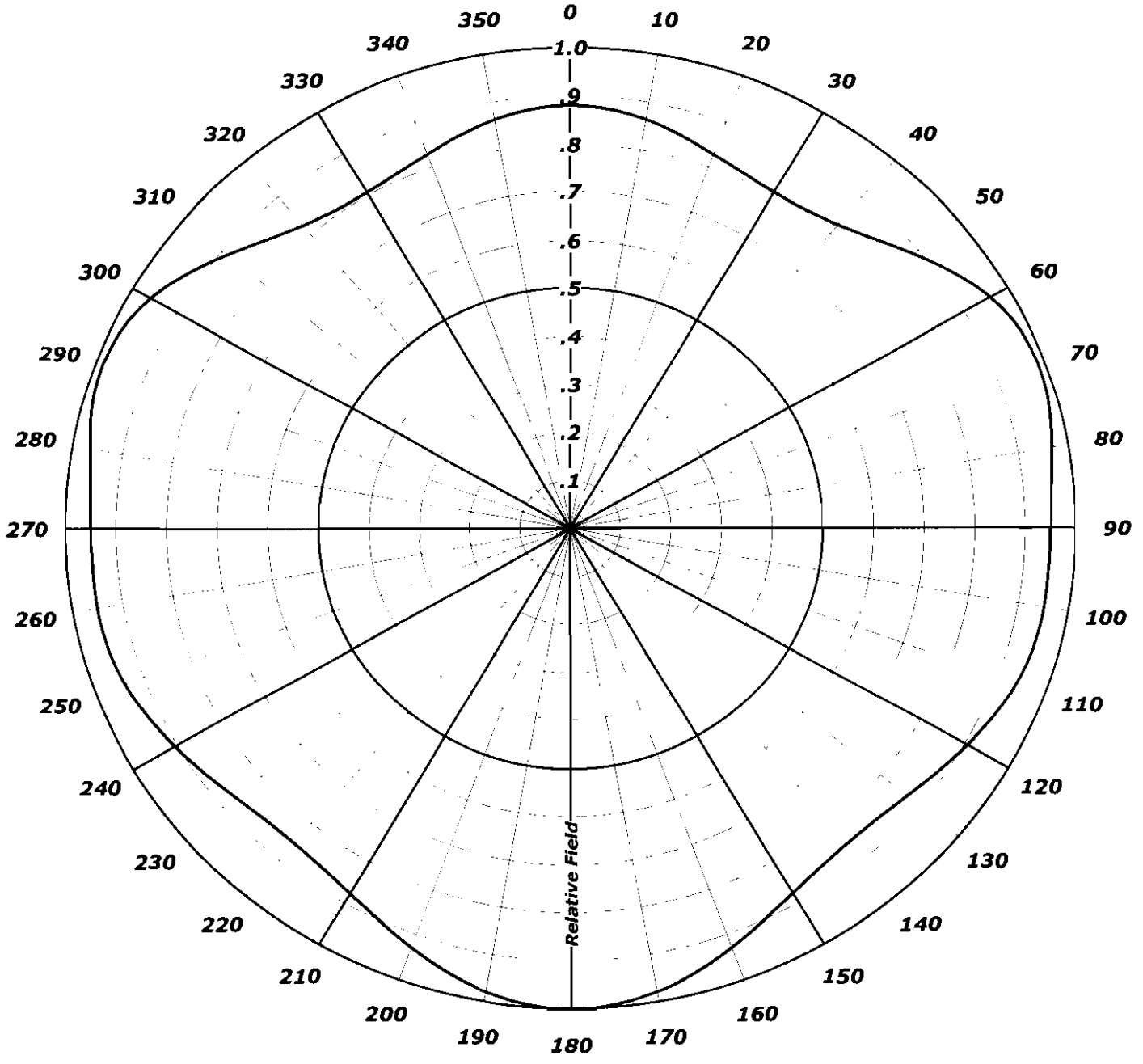
EXHIBIT E-3

ANTENNA MANUFACTURER'S DATA

ANDREW

AZIMUTH PATTERN

Type:	**CH39 Computed**	
	Numeric	**dBd**
Directivity:	**1.21**	**(0.83)**
Peak(s) At:		
Polarization:	**Horizontal**	
Channel:	**39**	
Location:	**Oklahoma City, OK**	



ANDREW CORPORATION
10500 W. 153rd Street
Orland Park, Illinois U.S.A. 60462

Incl Climbing Pole effects (theoretical)

ANDREW

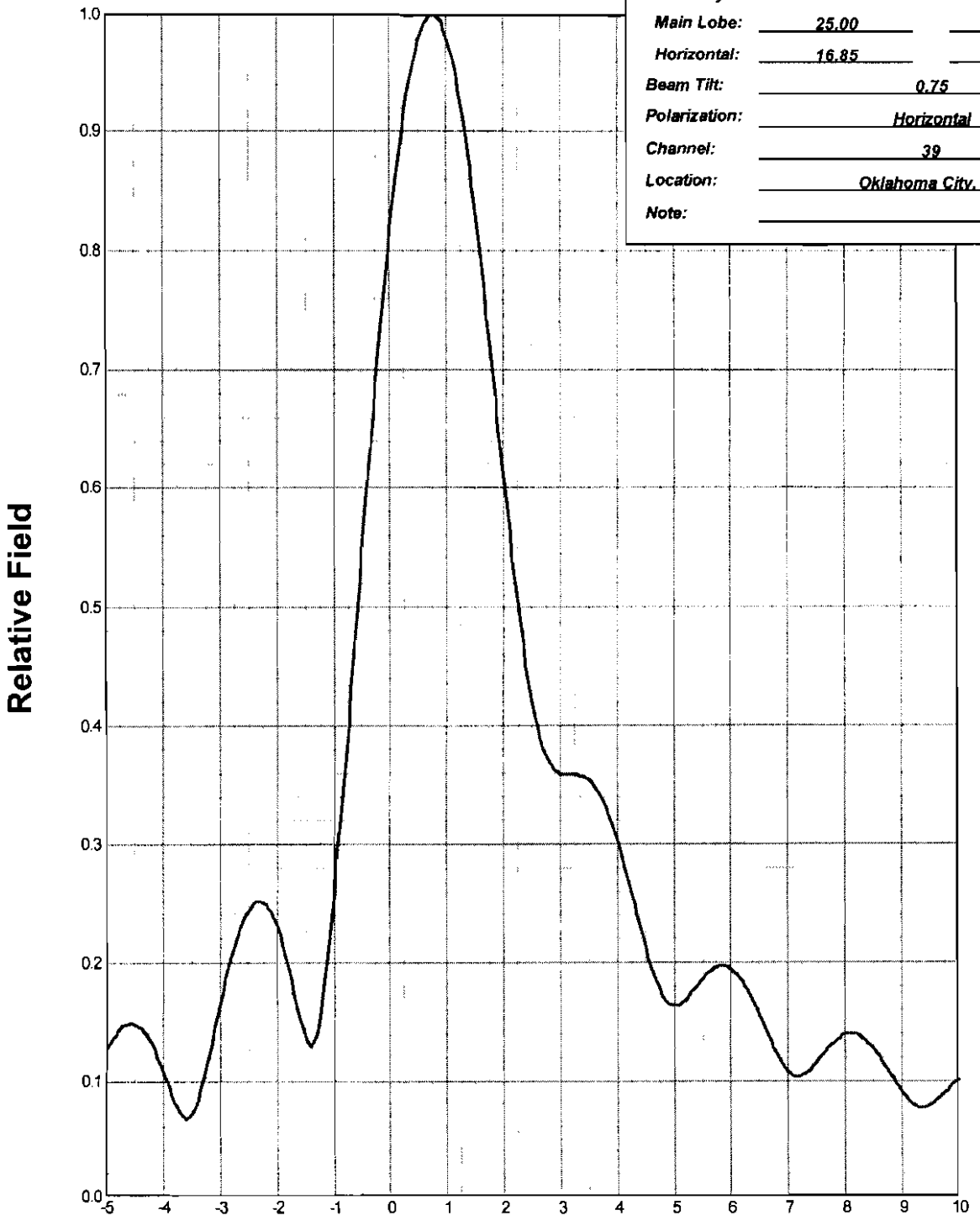
TABULATED DATA FOR AZIMUTH PATTERN
TYPE : CH39 Computed

Angle	Field	dB	Angle	Field	dB	Angle	Field	dB	Angle	Field	dB
0	0.881	-1.10	110	0.940	-0.54	220	0.854	-1.37	330	0.806	-1.87
2	0.880	-1.11	112	0.935	-0.59	222	0.854	-1.37	332	0.808	-1.85
4	0.878	-1.13	114	0.928	-0.65	224	0.855	-1.36	334	0.812	-1.81
6	0.875	-1.16	116	0.921	-0.72	226	0.858	-1.33	336	0.817	-1.76
8	0.870	-1.21	118	0.913	-0.79	228	0.863	-1.28	338	0.823	-1.69
10	0.865	-1.26	120	0.905	-0.86	230	0.868	-1.23	340	0.829	-1.63
12	0.859	-1.32	122	0.897	-0.94	232	0.874	-1.17	342	0.836	-1.55
14	0.851	-1.40	124	0.889	-1.02	234	0.882	-1.09	344	0.844	-1.47
16	0.844	-1.47	126	0.882	-1.09	236	0.889	-1.02	346	0.851	-1.40
18	0.836	-1.55	128	0.874	-1.17	238	0.897	-0.94	348	0.859	-1.32
20	0.829	-1.63	130	0.868	-1.23	240	0.905	-0.86	350	0.865	-1.26
22	0.823	-1.69	132	0.863	-1.28	242	0.913	-0.79	352	0.870	-1.21
24	0.817	-1.76	134	0.858	-1.33	244	0.921	-0.72	354	0.875	-1.16
26	0.812	-1.81	136	0.855	-1.36	246	0.928	-0.65	356	0.878	-1.13
28	0.808	-1.85	138	0.854	-1.37	248	0.935	-0.59	358	0.880	-1.11
30	0.806	-1.87	140	0.854	-1.37	250	0.940	-0.54	360	0.881	-1.10
32	0.806	-1.87	142	0.855	-1.36	252	0.944	-0.50			
34	0.807	-1.86	144	0.859	-1.32	254	0.947	-0.47			
36	0.811	-1.82	146	0.863	-1.28	256	0.949	-0.45			
38	0.817	-1.76	148	0.870	-1.21	258	0.951	-0.44			
40	0.824	-1.68	150	0.877	-1.14	260	0.951	-0.44			
42	0.834	-1.58	152	0.886	-1.05	262	0.950	-0.44			
44	0.845	-1.46	154	0.896	-0.96	264	0.950	-0.45			
46	0.858	-1.33	156	0.906	-0.85	266	0.949	-0.45			
48	0.873	-1.18	158	0.918	-0.75	268	0.949	-0.45			
50	0.888	-1.03	160	0.929	-0.64	270	0.950	-0.45			
52	0.904	-0.88	162	0.940	-0.54	272	0.951	-0.43			
54	0.919	-0.73	164	0.951	-0.44	274	0.954	-0.41			
56	0.933	-0.60	166	0.961	-0.35	276	0.957	-0.38			
58	0.947	-0.47	168	0.971	-0.26	278	0.962	-0.34			
60	0.959	-0.36	170	0.979	-0.18	280	0.967	-0.29			
62	0.969	-0.27	172	0.986	-0.12	282	0.973	-0.24			
64	0.977	-0.20	174	0.992	-0.07	284	0.978	-0.19			
66	0.983	-0.15	176	0.997	-0.03	286	0.983	-0.15			
68	0.986	-0.12	178	0.999	-0.01	288	0.985	-0.13			
70	0.987	-0.12	180	1.000	0.00	290	0.987	-0.12			
72	0.985	-0.13	182	0.999	-0.01	292	0.986	-0.12			
74	0.983	-0.15	184	0.997	-0.03	294	0.983	-0.15			
76	0.978	-0.19	186	0.992	-0.07	296	0.977	-0.20			
78	0.973	-0.24	188	0.986	-0.12	298	0.969	-0.27			
80	0.967	-0.29	190	0.979	-0.18	300	0.959	-0.36			
82	0.962	-0.34	192	0.971	-0.26	302	0.947	-0.47			
84	0.957	-0.38	194	0.961	-0.35	304	0.933	-0.60			
86	0.954	-0.41	196	0.951	-0.44	306	0.919	-0.73			
88	0.951	-0.43	198	0.940	-0.54	308	0.904	-0.88			
90	0.950	-0.45	200	0.929	-0.64	310	0.888	-1.03			
92	0.949	-0.45	202	0.918	-0.75	312	0.873	-1.18			
94	0.949	-0.45	204	0.906	-0.85	314	0.858	-1.33			
96	0.950	-0.45	206	0.896	-0.96	316	0.845	-1.46			
98	0.950	-0.44	208	0.886	-1.05	318	0.834	-1.58			
100	0.951	-0.44	210	0.877	-1.14	320	0.824	-1.68			
102	0.951	-0.44	212	0.870	-1.21	322	0.817	-1.76			
104	0.949	-0.45	214	0.863	-1.28	324	0.811	-1.82			
106	0.947	-0.47	216	0.859	-1.32	326	0.807	-1.86			
108	0.944	-0.50	218	0.855	-1.36	328	0.806	-1.87			

ANDREW.

ELEVATION PATTERN

Type:	ATW25H3H	
Directivity:	Numeric	dBd
Main Lobe:	25.00	13.98
Horizontal:	16.85	12.27
Beam Tilt:	0.75	
Polarization:	Horizontal	
Channel:	39	
Location:	Oklahoma City, OK	
Note:		

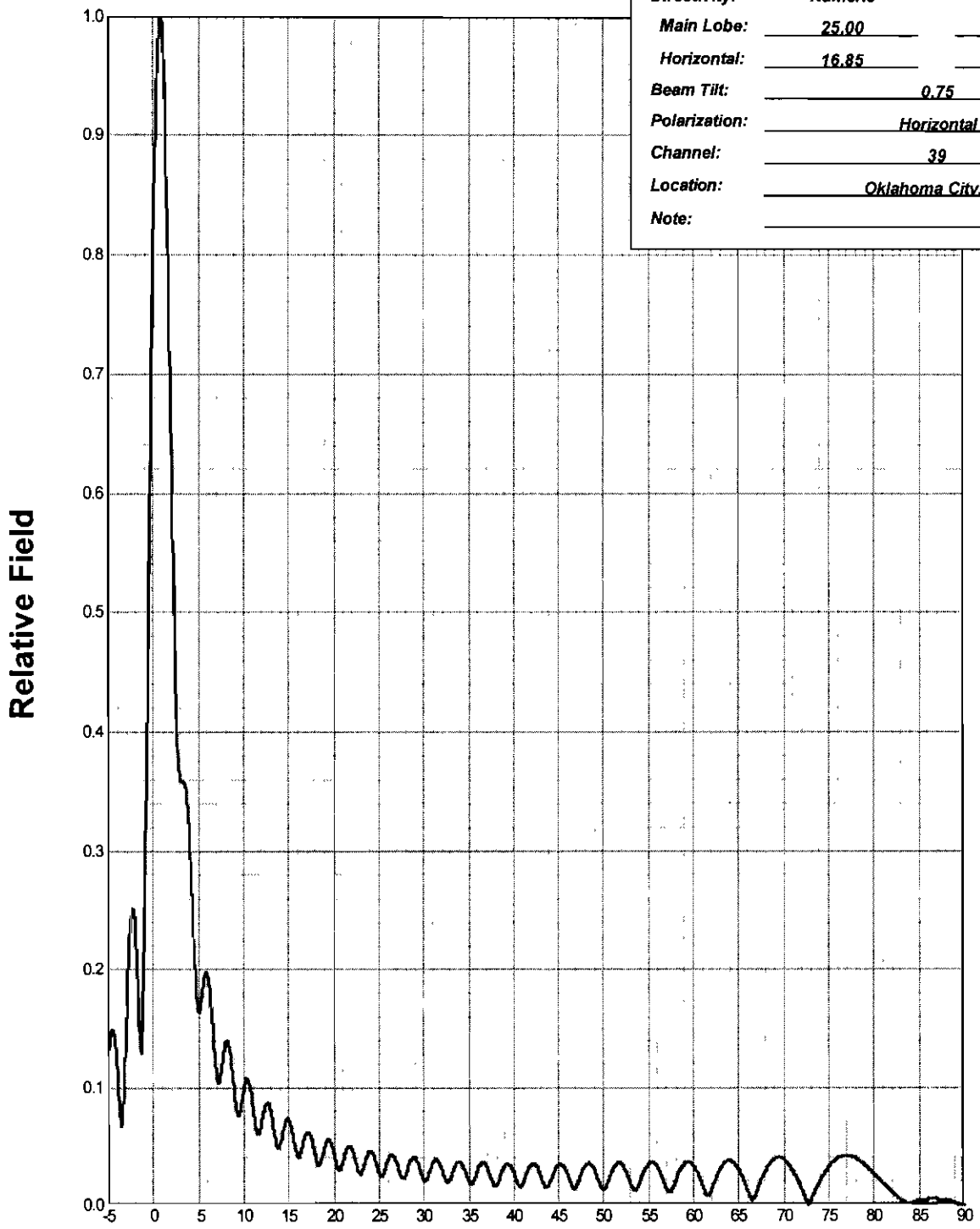


ANDREW.
ANDREW CORPORATION
10500 W. 153rd Street
Orland Park, Illinois U.S.A 60462

ANDREW®

ELEVATION PATTERN

Type:	ATW25H3H	
Directivity:	Numeric	dBd
Main Lobe:	25.00	13.98
Horizontal:	16.85	12.27
Beam Tilt:	0.75	
Polarization:	Horizontal	
Channel:	39	
Location:	Oklahoma City, OK	
Note:		



ANDREW®
ANDREW CORPORATION
10500 W. 153rd Street
Orland Park, Illinois U.S.A 60462

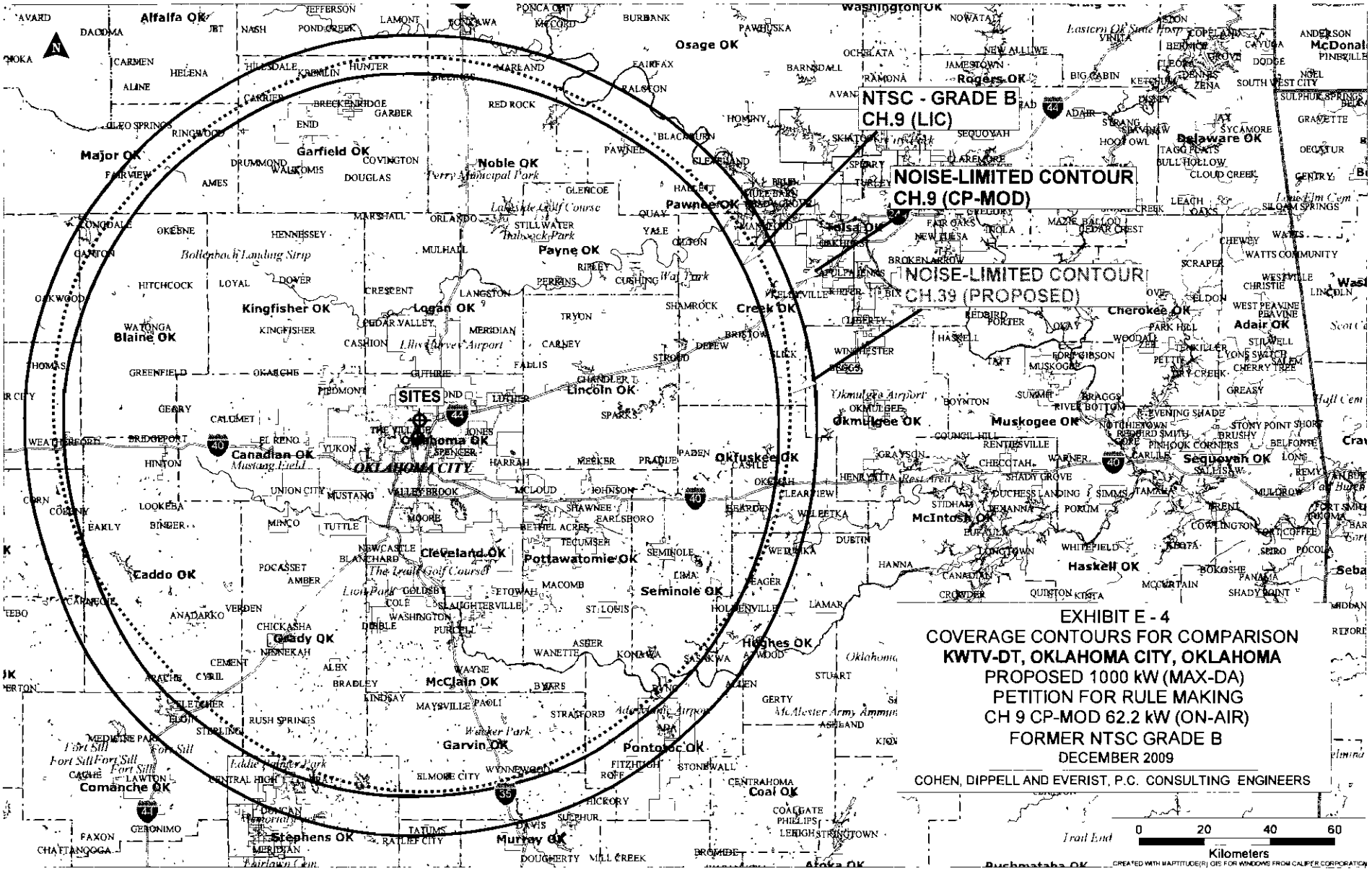
ANDREW.

ELEVATION TABULATED DATA

Type: ATW25H3H

Polarization: Horizontal

Angle	Field	dB	Angle	Field	dB	Angle	Field	dB	Angle	Field	dB
-5.00	0.127	-17.92	6.50	0.155	-16.19	42.00	0.035	-29.12	88.00	0.004	-47.96
-4.75	0.144	-16.80	6.75	0.128	-17.86	43.00	0.024	-32.40	89.00	0.002	-53.98
-4.50	0.148	-16.59	7.00	0.108	-19.33	44.00	0.019	-34.42	90.00	0.000	0.00
-4.25	0.135	-17.39	7.25	0.105	-19.58	45.00	0.035	-29.12			
-4.00	0.108	-19.33	7.50	0.116	-18.71	46.00	0.025	-32.04			
-3.75	0.076	-22.38	7.75	0.130	-17.75	47.00	0.018	-34.89			
-3.50	0.071	-22.97	8.00	0.139	-17.14	48.00	0.034	-29.37			
-3.25	0.112	-19.05	8.25	0.138	-17.23	49.00	0.029	-30.75			
-3.00	0.165	-15.65	8.50	0.127	-17.92	50.00	0.014	-37.08			
-2.75	0.213	-13.43	8.75	0.109	-19.25	51.00	0.031	-30.17			
-2.50	0.244	-12.25	9.00	0.090	-20.92	52.00	0.035	-29.12			
-2.25	0.251	-12.02	9.25	0.078	-22.16	53.00	0.018	-34.89			
-2.00	0.230	-12.77	9.50	0.079	-22.05	54.00	0.020	-33.98			
-1.75	0.184	-14.68	9.75	0.089	-20.96	55.00	0.035	-29.12			
-1.50	0.136	-17.33	10.00	0.101	-19.91	56.00	0.032	-29.90			
-1.25	0.154	-16.28	11.00	0.083	-21.62	57.00	0.013	-37.72			
-1.00	0.257	-11.80	12.00	0.073	-22.73	58.00	0.021	-33.56			
-0.75	0.399	-7.98	13.00	0.078	-22.16	59.00	0.036	-28.87			
-0.50	0.550	-5.19	14.00	0.052	-25.68	60.00	0.033	-29.63			
-0.25	0.695	-3.17	15.00	0.072	-22.85	61.00	0.016	-35.92			
0.00	0.821	-1.71	16.00	0.041	-27.74	62.00	0.014	-37.08			
0.25	0.918	-0.74	17.00	0.062	-24.15	63.00	0.032	-29.90			
0.50	0.980	-0.18	18.00	0.038	-28.40	64.00	0.038	-28.40			
0.75	1.000	0.00	19.00	0.052	-25.68	65.00	0.030	-30.46			
1.00	0.981	-0.17	20.00	0.043	-27.33	66.00	0.012	-38.42			
1.25	0.923	-0.70	21.00	0.038	-28.40	67.00	0.012	-38.42			
1.50	0.835	-1.57	22.00	0.047	-26.56	68.00	0.030	-30.46			
1.75	0.726	-2.78	23.00	0.027	-31.37	69.00	0.039	-28.18			
2.00	0.610	-4.29	24.00	0.046	-26.74	70.00	0.039	-28.18			
2.25	0.504	-5.96	25.00	0.027	-31.37	71.00	0.029	-30.75			
2.50	0.420	-7.54	26.00	0.039	-28.18	72.00	0.013	-37.72			
2.75	0.375	-8.53	27.00	0.035	-29.12	73.00	0.005	-46.02			
3.00	0.359	-8.90	28.00	0.028	-31.06	74.00	0.021	-33.56			
3.25	0.358	-8.92	29.00	0.040	-27.96	75.00	0.033	-29.63			
3.50	0.354	-9.02	30.00	0.021	-33.56	76.00	0.040	-27.96			
3.75	0.336	-9.47	31.00	0.037	-28.64	77.00	0.042	-27.54			
4.00	0.303	-10.37	32.00	0.030	-30.46	78.00	0.040	-27.96			
4.25	0.259	-11.75	33.00	0.024	-32.40	79.00	0.034	-29.37			
4.50	0.212	-13.47	34.00	0.037	-28.64	80.00	0.027	-31.37			
4.75	0.176	-15.07	35.00	0.020	-33.98	81.00	0.018	-34.89			
5.00	0.163	-15.76	36.00	0.031	-30.17	82.00	0.011	-39.17			
5.25	0.171	-15.34	37.00	0.032	-29.90	83.00	0.005	-46.02			
5.50	0.186	-14.61	38.00	0.017	-35.39	84.00	0.002	-53.98			
5.75	0.196	-14.15	39.00	0.034	-29.37	85.00	0.004	-47.96			
6.00	0.194	-14.24	40.00	0.027	-31.37	86.00	0.005	-46.02			
6.25	0.179	-14.94	41.00	0.019	-34.42	87.00	0.005	-46.02			


NTSC - GRADE B
CH.9 (LIC)
NOISE-LIMITED CONTOUR
CH.9 (CP-MOD)
NOISE-LIMITED CONTOUR
CH.39 (PROPOSED)
SITES
OKLAHOMA CITY
Alfalfa OK
Major OK
Garfield OK
Noble OK
Osage OK
Washington OK
Rogers OK
Delaware OK
Pawnee OK
Tulsa OK
Payne OK
Kingfisher OK
Logan OK
Creek OK
Cherokee OK
Adair OK
Blaine OK
Lincoln OK
Okmulgee OK
Muskogee OK
Canadian OK
Oklahoma OK
Okfuskee OK
Sequoyah OK
McIntosh OK
Caddo OK
Cleveland OK
Pottawatomie OK
Seminole OK
Haskell OK
Grady OK
McClain OK
Hughes OK
Garvin OK
Pontotoc OK
Coal OK
Comanche OK
Stephens OK
Murray OK
EXHIBIT E - 4
COVERAGE CONTOURS FOR COMPARISON
KWTV-DT, OKLAHOMA CITY, OKLAHOMA
PROPOSED 1000 kW (MAX-DA)
PETITION FOR RULE MAKING
CH 9 CP-MOD 62.2 kW (ON-AIR)
FORMER NTSC GRADE B
DECEMBER 2009
COHEN, DIPPELL AND EVERIST, P.C. CONSULTING ENGINEERS
0 20 40 60
Kilometers

SECTION III - D - DTV Engineering

Complete Questions 1-5, and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.

Pre-Transition Certification Checklist: An application concerning a pre-transition channel must complete questions 1(a)-(c), and 2-5. A correct answer of "Yes" to all of the questions will ensure an expeditious grant of a construction permit application to modify pre-transition facilities. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a eonstruction permit can be granted.

Post-Transition Expedited Processing. An application concerning a post-transition channel must complete questions 1(a), (d)-(e), and 2-5. A station applying for a construction permit to build its post-transition channel will receive expedited processing if its application (1) does not seek to expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"); (2) specifies facilities that mateh or closely approximate those defined in the new DTV Table Appendix B facilities; and (3) is filed on or before March 17, 2008 (45 days of the Report and Order in the Third DTV Periodic Review proceeding, MB Docket No. 07-91).

1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:

   (a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622. ☐ Yes ☒ No

   (b) It will operate a pre-transition facility from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622. ☐ Yes ☐ No

   (c) It will operate a pre-transition facility with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622. ☐ Yes ☐ No

   (d) It will operate at post-transition facilities that do not expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"). ☐ Yes ☐ No ☒ N/A

   (e) It will operate at post-transition facilities that match or reduce by no more than five percent with respect to predicted population from those defined in the new DTV Table Appendix B. ☐ Yes ☐ No ☒ N/A

2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RIF radiation exeeeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. ☒ Yes ☐ No

   Applicant must **submit the Exhibit** called for in Item 13.

3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted prineipal community. ☒ Yes ☐ No

4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable. ☒ Yes ☐ No

5. The antenna structure to be used by this facility has been registered by the Commission and will not require reregistration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7. ☒ Yes ☐ No

SECTION III - D DTV Engineering

TECHNICAL SPECIFICATIONS Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1. Channel Number: DTV 39 Analog TV, if any ———

2. Zone: ☐ I ☒ II ☐ III

3. Antenna Location Coordinates: (NAD 27)

35 ° 35 ' 52 " ☒ N ☐ S Latitude
97 ° 29 ' 22 " ☐ E ☒ W Longitude

4 Antenna Structure Registration Number: 1045226

☐ Not applicable ☐ FAA Notification Filed with FAA

5. Antenna Location Site Elevation Above Mean Sea Level: 335.9 meters

6. Overall Tower Height Above Ground Level: 502.0 meters

7 Height of Radiation Center Above Ground Level: 491.1 meters

8. Height of Radiation Center Above Average Terrain: 478.0 meters

9 Maximum Effective Radiated Power (average power): 1000 kW

10 Antenna Specifications:

a. Manufacturer: Andrew | Model: ATW25H3H

b. Electrical Beam Tilt: 0.75 degrees ☐ Not Applicable

c. Mechanical Beam Tilt: _____ degrees toward azimuth _____ degrees True ☒ Not Applicable

Attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(e). Exhibit No. statement

d. Polorization: ☒ Horizontal ☐ Circular ☐ Elliptical

TECH BOX

e Directional Antenna Relative Field Values: ☐ Not applicable (Nondirectional)

Rotation: _____ ° ☒ No rotation

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0	0.881	60	0.959	120	0.905	180	1.000	240	0.905	300	0.959
10	0.865	70	0.987	130	0.868	190	0.979	250	0.940	310	0.888
20	0.829	80	0.967	140	0.854	200	0.929	260	0.951	320	0.824
30	0.806	90	0.950	150	0.877	210	0.877	270	0.950	330	0.806
40	0.824	100	0.951	160	0.929	220	0.854	280	0.967	340	0.829
50	0.888	110	0.940	170	0.979	230	0.868	290	0.987	350	0.865
Additional Azimuths											

If a directional antenna is proposed, the requirements of 47 C.F.R. Section 73.625(c) must be satisfied. **Exhibit required.** Exhibit No.

11. Does the proposed facility satisfy the pre-transition interference protection provisions of 47 C.F.R. Section 73.623(a) (Applicable only if **Certification Checklist** Items 1(a), (b), or (c) are answered "No.") and/or the post-transition interference protection provisions of 47 C.F.R. Section 73.616? ☒ Yes ☐ No

If "No," attach as an Exhibit justification therefore, including a summary of any related previously granted waivers. Exhibit No. N/A

12. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefore. (Applicable only if **Certification Checklist** Item 3 is answered "No.") Exhibit No. N/A

13. **Environmental Protection Act. Submit in an Exhibit** the following: Exhibit No. statement

a If **Certification Checklist Item** 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

By checking "Yes" to **Certification Checklist** Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radio frequency electromagnetic exposure in excess of FCC guidelines.

If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R. Section 1.1311.

10. **Auction Authorization.** If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable.

An exhibit is required unless this question is inapplicable.

Exhibit No.

11. **Anti-Drug Abuse Act Certification.** Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.

☐ Yes ☐ No

12. **Equal Employment Opportunity (EEO).** If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.

☐ Yes ☐ No ☐ N/A

13. **Petition for Rulemaking/Counterproposal to Add New FM Channel to FM Table of Allotments.** If the application is being submitted concurrently with a Petition for Rulemaking or Counterproposal to Amend the FM Table of Allotments (47 C.F.R. Section 73.202) to add a new FM channel allotment, petitioner/counter-proponent certifies that, if the FM channel allotment requested is allotted, petitioner/counter- proponent will apply to participate in the auction of the channel allotment requested and specified in this application.

☐ Yes ☐ No ☐ N/A

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in 'good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing	Typed or Printed Title of Person Signing
Signature	Date

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name	Relationship to Applicant (e.g., Consulting Engineer)	
Ross J. Heide	Consulting Engineer	
Signature Ross J. Heide	Date December 2, 2009	
Mailing Address Cohen, Dippell and Everist, P.C., 1300 L Street, N.W., Suite 1100		
City Washington	State or Country (if foreign address) DC	ZIP Code 20005
Telephone Number (include area code) (202) 898-0111	E-Mail Address (if available) cde@attglobal.net	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

is 0.05 towards the ground at the base of the tower. It is calculated that proposed operation would have less than 0.6 microwatts per square centimeter ($\mu W/cm^2$) RF field at 2 meters above the base of tower. The Commission's MPE guidelines for Channel 39 (620-626 MHz) TV operation are 2,067 $\mu W/cm^2$ for the occupational/controlled and 413 $\mu W/cm^2$ for the general population/uncontrolled environment. The computed RF field due to the proposed operation would be less than 0.2% of the MPE for the general population/uncontrolled environment.

Therefore, members of the public and personnel working around the proposed TV facility would not be exposed to RF fields exceeding the Commission's guidelines. With respect to work performed on the tower, station KWTV-DT in coordination with other TV stations will establish procedures to ensure that workers are not exposed to RF fields above the Commission's guidelines, by reducing or turning off the power, as appropriate.

For the reasons stated above, it is believed this proposal complies with Section 1.1307(a) and (b) of the Commission's Rules; therefore, under Section 1.1306, it is categorically excluded from the environmental processing.

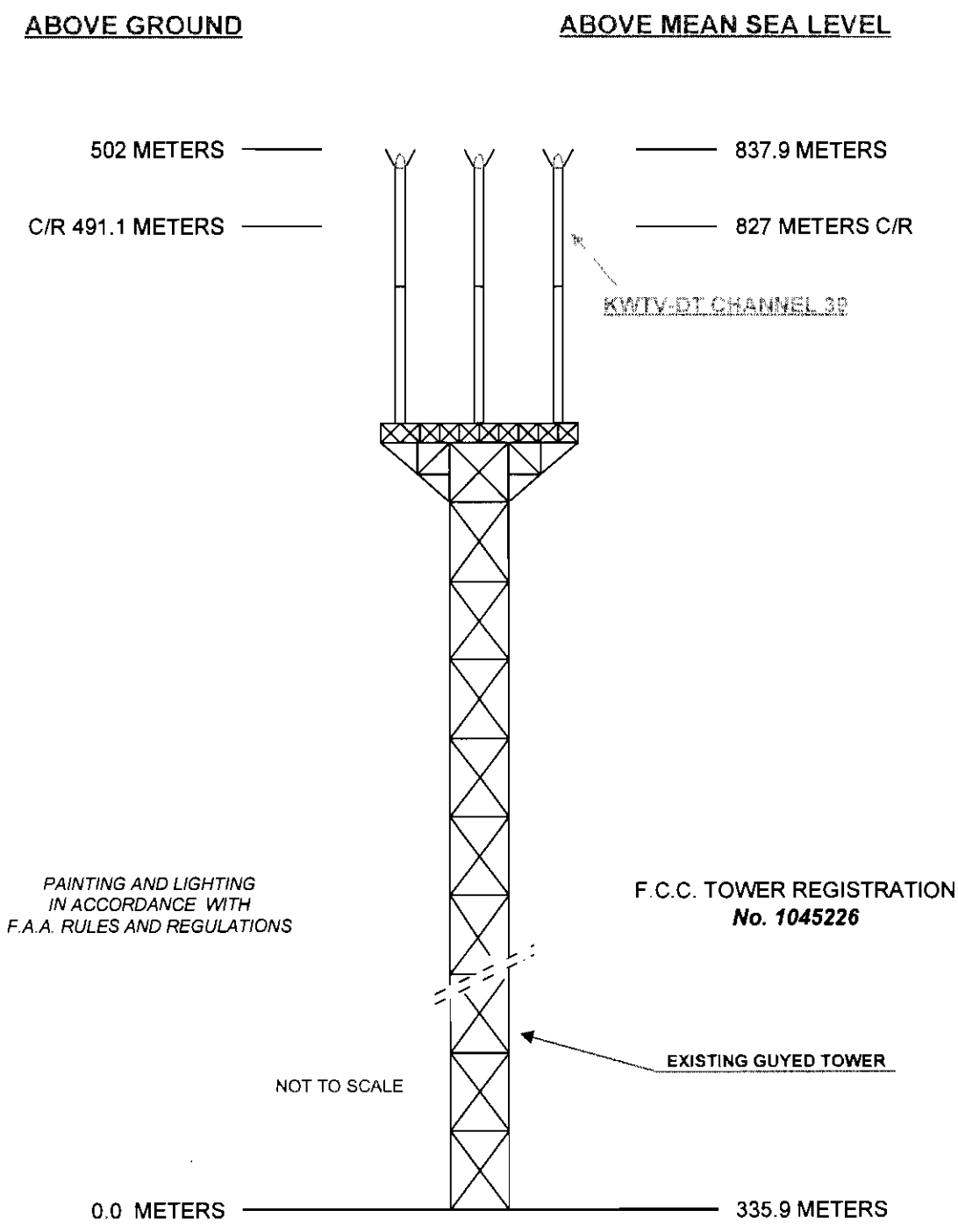


EXHIBIT E-1

VERTICAL SKETCH

FOR THE PROPOSED EXPERIMENTAL OPERATION OF

KWTV-DT, OKLAHOMA CITY, OKLAHOMA

DECEMBER 2009

COHEN, DIPPELL AND EVERIST, P.C. Consulting Engineers Washington, D.C.

COHEN, DIPPELL AND EVERIST, P.C.

TABLE I
COMPUTED COVERAGE DATA
FOR THE PROPOSED DTV OPERATION OF
KWTV-DT, OKLAHOMA CITY, OKLAHOMA
CHANNEL 39 1000 KW ERP 478 METERS HAAT
DECEMBER 2009

Radial	Average* Elevation	Effective Height	Depression Angle	ERP	Distance to Contour 48 dBu	41 dBu
N ° E, T	meters	meters	degrees	kW	km	km
0	351.7	475.2	0.604	776.2	95.0	110.1
10	352.6	474.3	0.603	748.2	94.6	109.7
20	349.0	477.9	0.606	687.2	94.2	109.1
30	341.5	485.4	0.610	649.6	94.2	109.2
40	341.1	485.8	0.611	679.0	94.6	109.6
50	333.4	493.5	0.615	788.5	96.5	111.7
60	325.4	501.5	0.620	919.7	98.5	113.8
70	319.0	507.9	0.624	974.2	99.6	114.8
80	331.7	495.2	0.616	935.1	98.1	113.5
90	336.6	490.3	0.613	902.5	97.4	112.8
100	342.4	484.5	0.610	904.4	97.0	112.4
110	345.9	481.0	0.607	883.6	96.5	111.9
120	346.9	480.0	0.607	819.0	95.8	111.0
130	351.0	475.9	0.604	753.4	94.8	109.9
140	351.5	475.4	0.604	729.3	94.5	109.5
150	350.2	476.7	0.605	769.1	95.0	110.1
160	350.8	476.1	0.604	863.0	95.9	111.3
170	350.7	476.2	0.604	958.4	96.8	112.3
180	353.8	473.1	0.602	1000.0	97.0	112.5
190	355.1	471.8	0.602	958.4	96.5	112.0
200	355.8	471.1	0.601	863.0	95.5	110.8
210	356.6	470.3	0.601	769.1	94.5	109.6
220	368.3	458.6	0.593	729.3	93.3	108.1
230	379.0	447.9	0.586	753.4	92.8	107.5
240	374.0	452.9	0.589	819.0	93.8	108.8
250	366.2	460.7	0.595	883.6	95.0	110.2
260	361.2	465.7	0.598	904.4	95.5	110.9
270	350.0	476.9	0.605	902.5	96.4	111.8
280	343.8	483.1	0.609	935.1	97.2	112.6

TABLE I
COMPUTED COVERAGE DATA
FOR THE PROPOSED DTV OPERATION OF
KWTV-DT, OKLAHOMA CITY, OKLAHOMA
CHANNEL 39 1000 KW ERP 478 METERS HAAT
DECEMBER 2009
(continued)

Radial	Average* Elevation	Effective Height	Depression Angle	ERP	Distance to Contour 48 dBu	41 dBu
N ° E, T	meters	meters	degrees	kW	km	km
290	338.7	488.2	0.612	974.2	97.9	113.4
300	334.6	492.3	0.615	919.7	97.8	113.1
310	334.1	492.8	0.615	788.5	96.5	111.7
320	330.5	496.4	0.617	679.0	95.5	110.5
330	331.3	495.6	0.617	649.6	95.0	110.0
340	337.7	489.2	0.613	687.2	95.0	110.0
350	339.4	487.5	0.612	748.2	95.6	110.7

*Based on data from FCC 3-second data base.

DTV Channel 39 (620-626 MHz)
Average Elevation 3.2 to 16.1 km 346.7 meters AMSL
Center of Radiation 827.0 meters AMSL
Antenna Height Above Average Terrain 478 meters
Effective Radiated Power 1000 kW (30 dBk) Max

North Latitude: 35° 35' 52"
West Longitude: 97° 29' 22"

(NAD-27)

COHEN, DIPPELL AND EVERIST, P.C.

TABLE II
PREDICTED INTERFERENCE
FOR THE PROPOSED DTV OPERATION OF
KWTV, OKLAHOMA CITY, OKLAHOMA
CHANNEL 39 1000 KW ERP 478 METERS HAAT
DECEMBER 2009

Channel	Call	City/State	Dist(km)	Status	FCC File No.	Result
24	KOMI-CD	WOODWARD OK	191.4	LIC	BLTTL-19950922IB	0.00%
25	KGCT-LP	NOWATA OK	206.5	LIC	BLTTA-20020805AAQ	0.00%
25	KUTU-CA	TULSA OK	148.3	LIC	BLTTL-20001120AAE	0.00%
36	KCHM-LP	OKLAHOMA CITY OK	25.5	APP	BMPTTA-20050707AAW	No interference
36	KCHM-LP	OKLAHOMA CITY OK	3.2	CP	BMJPTTA-20040504ABL	0.00%
38	K38GL	LAWTON OK	150.6	LIC	BLTTA-20031008AAD	No interference
38	KOHC-CA	OKLAHOMA CITY OK	26.4	LIC	BLTTA-20050808ACU	0.49%
39	KWOG	SPRINGDALE AR	294.8	PLN	DTVPLN-DTVPLN67347	1.50%
39	KWOG	SPRINGDALE AR	294.8	LIC	BLCDT-20070820ABS	0.44%
39	KLDT	LAKE DALLAS TX	338.3	CP	BPCDT-20080619AEY	0.01%
39	KLDT	LAKE DALLAS TX	343	PLN	DTVPLN-DTVPLN17433	0.00%
40	KAUT-TV	OKLAHOMA CITY OK	1.1	CP	BPCDT-20080620AFC	0.01%
40	KAUT-TV	OKLAHOMA CITY OK	1	PLN	DTVPLN-DTVPLN50182	0.45%
40	KAUT-TV	OKLAHOMA CITY OK	0	LIC	BLCDT-20060504ACH	0.00%

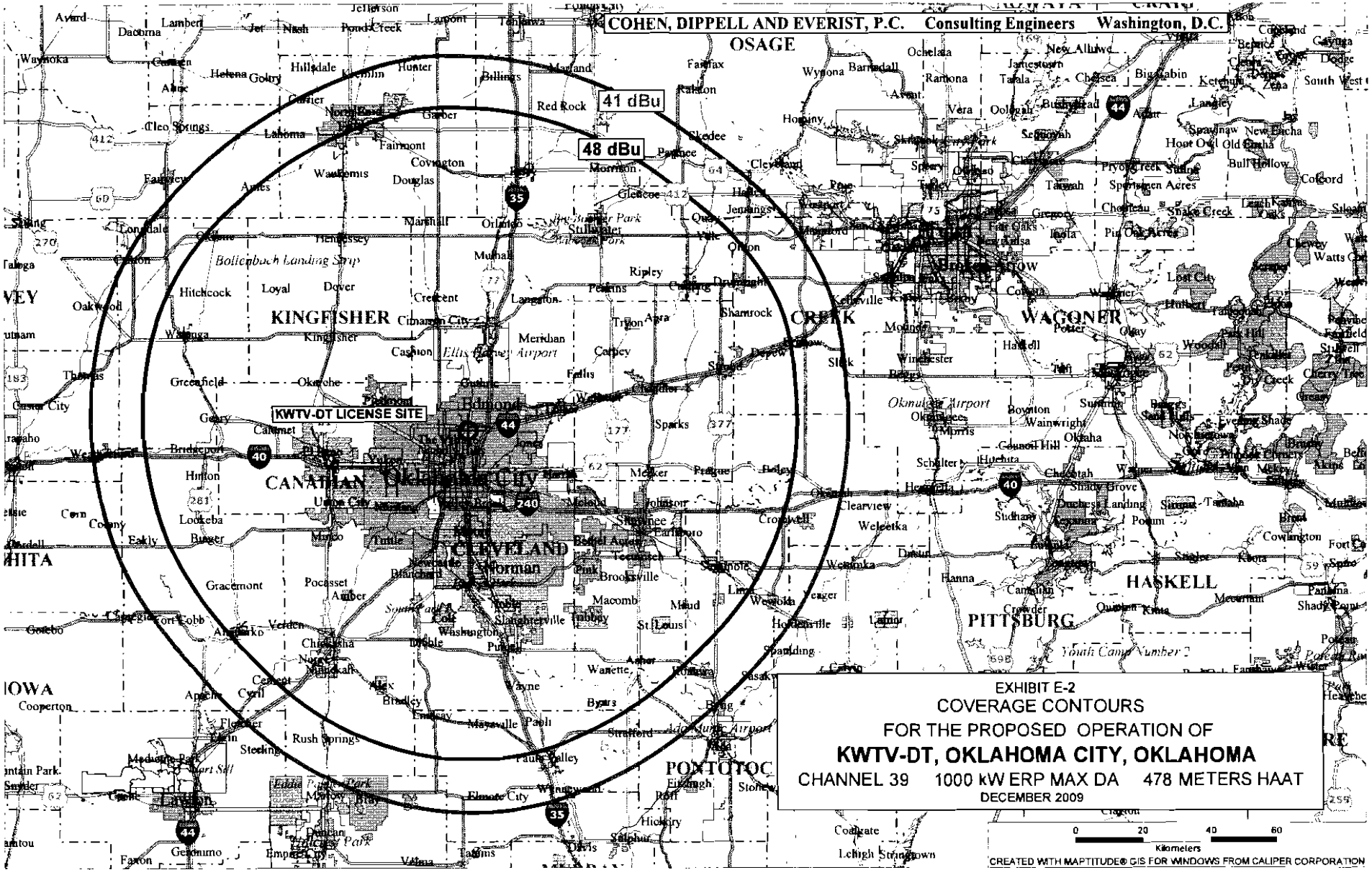

COHEN, DIPPELL AND EVERIST, P.C. Consulting Engineers Washington, D.C.
41 dBu
48 dBu
KWTV-DT LICENSE SITE
OSAGE
KINGFISHER
CANADIAN
CLEVELAND
CREEK
WAGONER
HASKELL
PITTSBURG
PONTOTOC
Oklahoma City
Edmond
Norman
Bolicnbuch Landing Strip
Ellis Airport
Oknulgee Airport
EXHIBIT E-2
COVERAGE CONTOURS
FOR THE PROPOSED OPERATION OF
KWTV-DT, OKLAHOMA CITY, OKLAHOMA
CHANNEL 39 1000 kW ERP MAX DA 478 METERS HAAT
DECEMBER 2009
0 20 40 60
Kilometers
CREATED WITH MAPTITUDE® GIS FOR WINDOWS FROM CALIPER CORPORATION

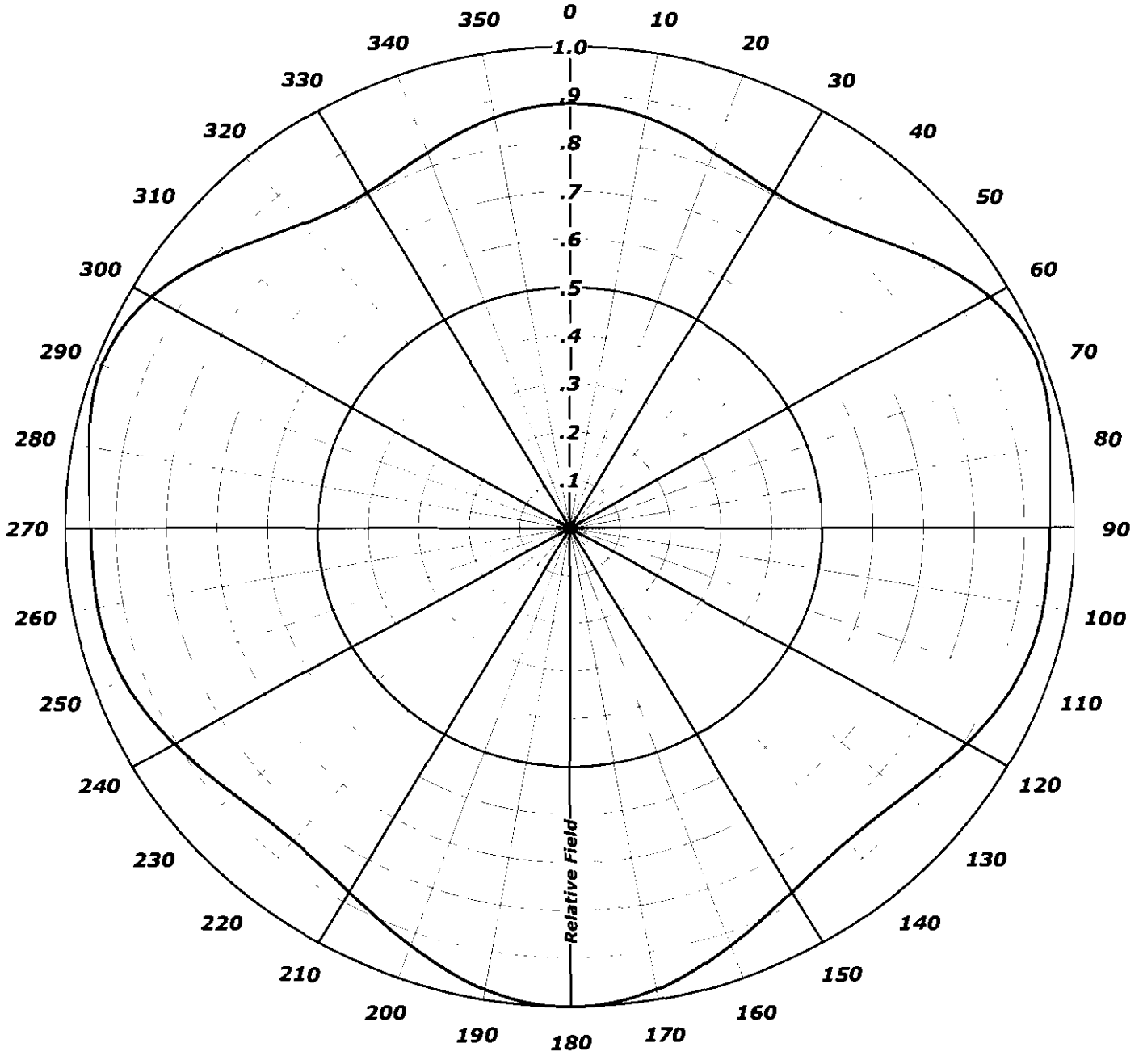
EXHIBIT E-3

ANTENNA MANUFACTURER'S DATA

ANDREW

AZIMUTH PATTERN

Type:	**CH39 Computed**	
	Numeric	**dBd**
Directivity:	**1.21**	**(0.83)**
Peak(s) At:		
Polarization:	**Horizontal**	
Channel:	**39**	
Location:	**Oklahoma City, OK**	



ANDREW CORPORATION
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Incl Climbing Pole effects (theoretical)